

From: Neste, David E - DNR
Sent: Wednesday, September 23, 2020 3:45 PM
To: Danko, Jeff; Rick Bethel
Cc: Scott D Wahl; Verburg, Ben; michael.bedard (michael.bedard@arcadis.com)
Subject: DNR Response to Proposed Work Scope – Assessment of Ditch B Conditions

Jeff,

This email is a response to the email sent on September 15, 2020 by Ben Verburg of Arcadis on behalf of Johnson Controls, Inc and Tyco Fire Products (JCI/Tyco) regarding proposed tasks for the assessment of Ditch B conditions.

First, thank you for providing the proposed scope of work to address per- and poly-fluorinated alkyl substances (PFAS) contamination in groundwater and surface water on and around the JCI/Tyco Fire Technology Center (FTC). The purpose of the submitted scope is to outline the installation of infrastructure necessary to begin the collection of surface water and groundwater data before the onset of freezing conditions in winter 2020. A complete site investigation workplan is to follow.

JCI/Tyco Proposed Scope of Work

The proposed scope includes the following tasks:

1. Evaluation of access to Ditch B and determination of need for permits for the data collection.
2. Utility clearance.
3. Installation of up to 30 stream-bed mini-piezometers in 3 specific segments of Ditch B.
 - a. Approximately 10 mini-piezometers installed between PZ-05 and PZ-06.
 - b. Approximately 10 mini-piezometers installed between PZ-06 and PZ-07.
 - c. Approximately 10 mini-piezometers installed between PZ-07 and PZ-09.
4. Collection of groundwater and surface water samples monthly for up to one year; the expectation is to complete up to three events in Fall 2020. The groundwater samples will be collected from the mini-piezometers. The surface water samples will also be collected next to each of the mini-piezometers. Therefore, a total of up to 60 samples (30 groundwater samples from mini-piezometers and 30 surface water samples) will be collected and analyzed for 36 PFASs during each monthly event.
5. Collection of monthly elevation data of surface water and groundwater from the locations of the 30 mini-piezometers in the ditch (groundwater elevation from mini-piezometer and surface water elevation from water surface adjacent to mini-piezometer).
6. Collection of continuous surface water and groundwater elevation data from piezometers and stilling well pairs PZ-05/STW-05, PZ-06/STW-06, PZ-07/STW-07, PZ-08/STW-08, and PZ-09/STW-09 using pressure transducers deployed. The exact deployment time will be dependent on weather.
7. Compilation and review of the surface water/groundwater analytical results and surface water/groundwater elevation data on a real-time basis.
8. Reporting of the data collection efforts and data interpretation in periodic teleconference calls with DNR.

DNR Review

After review of the scope of work, the DNR is in general concurrence with the proposed tasks. In addition to the work proposed in the scope, the DNR provides the following direction:

- Increase the sampling frequency of the mini-piezometers installed between PZ-07 and PZ-09 from monthly to weekly.

- Similar to other sampling events, JCI/Tyco may request a reduction in surface water sampling frequency at a future date.

For efficiency purposes, the DNR recommends the weekly samples to be collected at the same time as the Ditch B treatment system monitoring as required by the WPDES permit. To be clear, this surface water sampling is a remedial action interim action requirement, not a WPDES requirement. The reason the DNR is providing this direction for an increase in surface water sampling frequency is to collect adequate data to evaluate the need for implementation of additional preventative measures to minimize or prevent any further hazardous substance discharges (Wis. Admin. Code § NR 708.07(4)) and ensure the efficacy of the interim remedial action surface water treatment system.

If you have any questions about this concurrence to proceed with an increased sampling frequency, please contact me at (920) 362-2072.

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